

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Boston Edison Company, Cambridge)	D.T.E. 03-121
Electric Light Company, and)	
Commonwealth Electric Company)	
d/b/a NSTAR Electric)	
)	

DIVISION OF ENERGY RESOURCES' FIRST SET OF INFORMATION AND
DOCUMENT REQUESTS TO WESTERN MASSACHUSETTS ELECTRIC
COMPANY

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Division of Energy Resources ("DOER") to Western Massachusetts Electric Company ("WMECo" or "the Company"), in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records,

- microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
 6. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department of Telecommunications and Energy (“DTE”), and a copy on William Stevens, Hearing Officer for the DTE, as well as serving the appropriate number of copies to all parties and participants on the service list in this proceeding.
 7. Please provide responses to all questions within 10 days (filed no later March 9, 2004). If this is not possible for any of the questions, please indicate which questions will take longer than 10 days within the earlier responses.

Information and Document Requests

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| DOER-WMECO-1-1 | Referring to Mr. Davis’ testimony at page 2, lines 3 – 4, please provide a complete copy of your testimony presented before the Connecticut Department of Public Utility Control in Docket Nos. 92-11-11 and 99-03-36. |
| DOER-WMECO-1-2 | Please provide copies of the resulting Orders and Tariff Sheets from Docket Nos. 92-11-11 and 99-03-36. |
| DOER-WMECO- 1-3 | Referring to Mr. Davis’ testimony at page 3, lines 21 – 22, please provide all standby service rates, both under the specific standby rate structure (Rate PR), and under general service rates, including specific contracts for standby service. |

- DOER-WMECO-1-4 Please describe the standby rate treatment that WMECO's affiliate Northeast Utilities has proposed, and has put in place in Connecticut.
- DOER-WMECO-1-5 Please provide calculations and related workpapers or accurate estimates and workpapers of the levels of diversity between individual customer loads at the aggregate system level and the Company's distribution plant level.
- DOER-WMECO-1-6 Please provide the rate sheets for all customers requiring non-firm standby service from WMECO or Northeast Utilities.
- DOER-WMECO-1-7 Please provide a forecast of growth in standby service in WMECO and NU's territories.

Dated: March 26, 2004

CERTIFICATE OF SERVICE

I, Steven I. Venezia, hereby certify that I have served the foregoing documents upon the service list in the above-docketed proceeding in accordance with the requirements of 220 CMR 1.05, this 26th day of March 2004.

Steven I. Venezia, Esq.

